

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**BENJAMIN HAITH INTELLECTUAL
PROPERTY, LLC,**

Plaintiff,

v.

ADOBE INC.

Defendant.

Case No. 4:25-cv-00310-LMC

**CONSENT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE ANSWER OR OTHER
RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

COMES NOW Defendant Adobe Inc. ("Defendant"), by and through its undersigned counsel, and requests an extension of time for Defendant to file an answer or other responsive pleading to Plaintiff's Complaint to June 26, 2025. In support of this motion, Defendant states as follows:

1. Defendant was served with the Summons and Complaint on May 2, 2025.
2. Defendant's current deadline to file an answer or other responsive pleading was May 23, 2025.
3. So that Defendant has sufficient time to investigate the facts alleged in the Complaint and to retain local counsel, Defendant requested that Plaintiff agree to an extension of the time for Defendant to file an answer or other responsive pleading to June 26, 2025.
4. Counsel for Plaintiff has consented to this extension of time.
5. This is the first request for extension of time for Defendant to file an answer or other responsive pleading.

6. Defendant's requested extension is made in good faith and is not for the purpose of delay or otherwise prejudicing Defendant. In making this request, Defendant expressly reserves all of its defenses to Plaintiff's Complaint, including, without limitation, the defense of lack of personal jurisdiction.

WHEREFORE, Defendant respectfully requests this Court grant its Motion for Extension for Defendant to File Answer or Other Responsive Pleading to Plaintiff's Complaint, extend the deadline for Defendant to file an answer or other responsive pleading to June 26, 2025, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**ARNOLD & PORTER, KAYE SCHOLLER,
LLP**

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Attorneys for Defendant Adobe Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically with the United States District Court for the Western District of Missouri, this 27th day of May, 2025, with notice of case activity generated and sent electronically to all counsel of record.

/s/ Chris Nease